

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

<p>In re:</p> <p>JC USA, Inc., <i>et al.</i>,¹</p> <p style="text-align: center;">Debtors.</p>	<p>Chapter 7</p> <p>Case No. 23-10585 (JKS) (Jointly Administered)</p> <p>Hearing Date: February 19, 2026 at 10:00 a.m. (ET) Obj. Deadline: Dec. 18, 2025 at 4:00 p.m. (ET)</p> <p>Related D.I. 612</p>
<p>Don A. Beskrone, Chapter 7 Trustee for JC USA, Inc., <i>et al.</i>,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">v.</p>	
American Service Industries, Inc.	Adv. Pro. No. 25-50645 (JKS)
Aon Risk Services Central, Inc.	Adv. Pro. No. 25-50647 (JKS)
Avid Floor Maintenance, Inc.	Adv. Pro. No. 25-50653 (JKS)
Burlington Crossroads (E&A) LLC	Adv. Pro. No. 25-50661 (JKS)
Allendale KOP Investments, L.P. f/k/a CMW Investments Ltd.	Adv. Pro. No. 25-50670 (JKS)
DDR Southeast Fountains, LLC	Adv. Pro. No. 25-50679 (JKS)
Dollinger-Glendale Associates, a California Limited Partnership	Adv. Pro. No. 25-50689 (JKS)
Google LLC	Adv. Pro. No. 25-50723 (JKS)
Liberty Distributors Inc.	Adv. Pro. No. 25-50737 (JKS)
Mainfreight, Inc.	Adv. Pro. No. 25-50740 (JKS)
Rhino Holdings Blue Oaks, LLC	Adv. Pro. No. 25-50773 (JKS)
Shirts Without Buttons, LLC	Adv. Pro. No. 25-50798 (JKS)
TRPF Promenade Plaza LLC	Adv. Pro. No. 25-50810 (JKS)
UKG, Inc. f/k/a Ultimate Software Group, Inc.	Adv. Pro. No. 25-50812 (JKS)

¹ The Debtors in these cases, along with the last four digits of their federal tax identification numbers, are: JC USA, Inc. (0028), JC Franchising, Inc. (7656), New JC Holdings, Inc. (1506), JC Acquisition, Inc. (2395), JC Inter. Holdings, Inc. (3621) JC Hold, LLC (4170).

**CERTIFICATE OF NO OBJECTION REGARDING
MOTION OF DON A. BESKRONE, CHAPTER 7 TRUSTEE, TO APPROVE
SETTLEMENT OF CERTAIN CHAPTER 5 CLAIMS PURSUANT
TO FEDERAL RULE OF BANKRUPTCY PROCEDURE 9019**

I, Benjamin Keenan, an attorney of the law firm of Ashby & Geddes, P.A., counsel to Don A. Beskrone, chapter 7 trustee (the “Trustee”) in the above-captioned case, hereby certify:

1. On December 4, 2025, the Trustee filed the *Motion of Don A. Beskrone, Chapter 7 Trustee, to Approve Settlement of Certain Chapter 5 Claims Pursuant to Federal Rule of Bankruptcy Procedure 9019* (the “Motion”) [D.I. 612]. Attached to the Motion is a proposed form of order approving the Motion and the relief sought therein (the “Proposed Order”).

2. Pursuant to the notice of the Motion, objections or responses, if any, to the Motion were to be filed with the Court and served upon the undersigned counsel by December 18, 2025 at 4:00 p.m. (ET).

3. As of the date hereof, undersigned counsel has not been served with any objections or responses to the Motion. A review of the Court’s docket indicates that, as of this date, no responses or objections to the Motion have been filed.

WHEREFORE, the Trustee respectfully requests that the Court enter the Proposed Order at its earliest convenience.

Dated: January 5, 2026

ASHBY & GEDDES, P.A.

/s/ Benjamin Keenan

Ricardo Palacio (DE Bar No. 3765)

Benjamin Keenan (DE Bar No. 4724)

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Chapter 7 Trustee